

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

13 MAR 1987

MEMORANDUM

SUBJECT: Monsanto Agricultural Products Company
Luling, Louisiana (LAD001700756)

FROM: Robert S. Hanneschlager, P.E., Chief Original signed by
Superfund Enforcement Branch (6H-E) Robert Hanneschlager

TO: Sam Becker, Chief
Hazardous Waste Compliance Branch (6H-C)

The Monsanto Agricultural Products Company in Luling, Louisiana is a fertilizer and herbicide manufacturer. This facility was listed in the 1980 EPA publication entitled Dioxins (EPA-600/2-80-197) as a potential site contaminated by dioxin due to the manufacturing of Propanil and 3,4-dichloroaniline.

The company instituted a dioxin sampling program at the site in 1983, after EPA expressed an interest in sampling at the site. 2,3,7,8-TCDD was found in the soil at the loading docks along the railroad line. The contamination was determined to be from spills that occurred during the unloading of 2,4,5-T from November 1965-January 1966 and for five months in 1967.

In response to the documented dioxin contamination, the company prepared a Dioxin Management Plan. Based on the sample results, the company feels the contamination is limited to a confined area and is best managed by leaving the soil in place. The control area is covered with plastic sheeting and a 4-6 inch layer of shells. The management plan outlines the requirements for contaminant measures, area maintenance/construction restrictions, environmental control procedures and safety/industrial hygiene procedures.

As part of the Natural Dioxin Study, EPA evaluated the dioxin management strategy being employed by Monsanto. The evaluation included additional sampling, assessment of the management plan and a risk assessment.

The sampling results obtained by EPA agree with the earlier results obtained by Monsanto. However, dioxin contamination was detected in a drainage ditch west of the covered central area. This ditch and any related work activities in the area was not covered under the Dioxin Management Plan. Monsanto has responded by collecting additional samples to define the extent of contamination.

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The Risk Assessment evaluated the health risks for six exposure routes. The only route for which estimated exposures exceeded acceptable levels was direct contact with 2,3,7,8-TCDD contaminated (based on 2,3,7,8-TCDD toxicity equivalents) sediments. Both short-term non-carcinogenic risks and lifetime carcinogenic risks can be reduced to safe levels once Monsanto implements protective measures for potentially exposed workers. None of the other exposure routes appeared to present significant health risks for onsite or off-site populations.

A copy of the risk assessment has been provided to Monsanto, along with recommendations for changes in their Dioxin Management Plan.

Since the activities at this facility are covered by RCRA and the facility is currently being evaluated by the RCRA program, this information is being referred to the Hazardous Waste Compliance Branch for further review and possible follow-up action. No further action by the Superfund Enforcement Branch is planned at this time.

The file contains Monsanto's Dioxin Management Plan and the Risk Assessment prepared for EPA by PRC Engineering. Please have the person assigned to this site from your Branch contact Tony Gardner of my staff (x 9762) to obtain the complete site file and any other information related to our site involvement to this time.